J. MAURICE CARLISLE AND BETTY C. CARLISLE, HIS WIFE, ET. AL.

COMPLAINANTS

EQUITY 18997 NO.

COURT FOR IN THE CIRCUIT

FREDERICK COUNTY, IN EQUITY.

VS.

WILLIAM A. MANION, ET. AL. DEFENDANTS

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of J. Maurice Carlisle and Betty C. Carlisle, his wife, A. Raymond Carlisle and Edna M. Carlisle, his wife, Agnes H. Morningstar, widow, Annie I. Manion, unmarried, Fanny C. Ensor and Harry M. Ensor, her husband, Helen C. Burdette and Lloyd W. Burdette, her husband, James Maurice Carlisle, Jr. and Mary Ann Carlisle, his wife, Marion F. Manion and Tina C. Manion, his wife, Marshall J. Manion and Esther Manion, his wife, by W. Jerome Offutt, their Solicitor, respectfully shows unto your Honorable Court:

FIRST: That the Bill of Complaint was filed in this cause on October 3, 1958.

That an Order of Publication was published in "The Frederick Post" a newspaper published in Frederick County, once a week for four successive weeks prior to the 6th day of December, 1958, commanding the Defendants, William A. Manion and Irene Manion, his wife, non-residents, to appear in this Court, either in person or by Solicitor, before the 6th day of December, 1958, as will appear by a Certificate of Publication filed herewith and marked "Exhibit C."

THIRD: That the said Defendants have failed to appear either in person or by Solicitor, within the time allowed by law and the Plaintiffs desire to take testimony to support the allegations of the Bill of Complaint.

TO THE END THEREFORE:

- 1. That the Bill of Complaint be taken pro confesso against the said Defendants, William A. Manion and Irene Manion.
- 2. That the Plaintiffs be permitted to take testimony to support the allegations of the Bill of Complaint before one of the standing Examiners of this Court.

And as in duty bound, etc.

Soligitor for Complainant

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W. JEROME OFFUTT ATTORNEY AT LAW FREDERICK, MD.